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February 16, 2024

**Via ECF**

The Honorable Arun Subramanian  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *Morales, et al. v. Performance Master, Inc. et al.***  
**Civil Docket No.: 21-cv-00097-ER**

Dear Judge Subramanian:

Our office represents Defendants J.D.M. Marmol & Granite and Marcos Zhiminaicela in the above-referenced matter. This letter is submitted to respectfully request a one-week extension to February 23, 2024, to submit Defendants' Reply.

The basis for this request is that the undersigned is leaving the firm and new counsel is being assigned to the matter. Further, Plaintiffs did not provide the exhibits for their opposition at any time prior in discovery but only upon submitting their opposition to summary judgment to which we require additional time to review and discuss the same with Defendants.

We kindly thank Your Honor for your consideration of this request.

Very truly yours,

/s/ Matthew Madzelan  
Matthew Madzelan, Esq.

SO ORDERED.

Arun Subramanian, U.S.D.J.  
Date: February 16, 2024